

REMARKS

This is intended as a full and complete response to the Final Office Action dated January 25, 2006, having a shortened statutory period for response set to expire on April 25, 2006. The Examiner rejected claims 14, 16, and 24-26 under 35 U.S.C. § 103(a) as being obvious over Saito (US 5,994,643) in view of Chang (US 5,153,380). The Examiner rejected claims 15 and 17-21 under 35 U.S.C. § 103(a) as being obvious over Satio in view of Chang as applied in claim 14 and further in view Shu (US 4,567,318).

Claim Objections

The Examiner objected to claims 15 and 17-21 due to informalities. In response, Applicants have amended claims 15 and 17-21 accordingly. Therefore, Applicants respectfully request the objection to the claims be removed.

Claim Rejections Under 35 U.S.C. § 103(a)

The Examiner rejected claim 14 as being obvious over Saito in view of Chang. The Examiner states that Saito discloses all the limitations of the above claim except for a module housing having a knife-shaped edge that bites into a bottom surface of the lid when the lid is pressed onto the module housing to form a metal to metal contact sealing surface. As such, the Examiner attempts to supplement this missing limitation with Chang. According to the Examiner, it would have been obvious to one of ordinary skill in the art at the time the invention was made to provide a housing disclosed in Saito with a knife-shaped edge as taught by Chang to provide means for tightly securing the lid to the module housing.

Applicants respectfully traverse the rejection on grounds that the Examiner has failed to establish a *prima facie* case of obviousness. To establish a *prima facie* case of obviousness, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference, or to combine reference teachings. If proposed modification would render the prior art invention being modified unsatisfactory for its intended purpose, then there is no suggestion or motivation to make the proposed modification. *In re Gordon*, 733 F.2d 900, 221 USPQ 1125 (Fed. Cir. 1984) The lid "14" disclosed in Saito is configured to slide along a contact portion "10" of the

housing "1" in order to interlock with the housing "1". (See Saito, col. 4, lines 30-35, 40-43 and Figure 6) Thus, if the contact portion "10" of the housing "1" included a knife-shaped edge, as suggested by the Examiner, the lid "14" would not be able to slide along the contact portion "10" of the housing "1" and interlock with the housing "1". As a result, the proposed modification of Saito with the knife-shaped edge as taught by Chang would render the lid and housing arrangement of Saito unsatisfactory for its intended purpose.

Further, to establish a *prima facie* case of obviousness, all claim limitations must be taught or suggested by the prior art. See *In re Royka*, 490 F.2d 981, 180 USPQ 580 (CCPA 1974). Claim 14 includes the limitation of a module housing having a cavity with an upper wall, a side wall and a lower wall, wherein the lid and the module housing are held together when a portion of the lid enters into the cavity and forms a holding pressure point proximate the upper wall of the cavity that interlocks the lid and the module housing. The combination of Saito and Chang does not disclose these limitations. In contrast, item "14" in Saito, which the Examiner refers to as a cavity, is merely a groove having a side wall "9" and a lower wall "13" as clearly shown in Figure 2 of Saito. Further, Chang does not cure the deficiencies of Saito.

As the foregoing illustrates, the Examiner has failed to establish *prima facie* case of obviousness. As a result, the combination of Saito and Chang fails to render claim 14 obvious. Applicants therefore submit that claim 14 is in condition for allowance and respectfully request withdrawal of the § 103(a) rejection. Additionally, since claims 16 and 24-26 depend from claim 14, they are allowable for at least the same reasons as claim 14.

The Examiner rejected claims 15 and 17-21 as being obvious over Saito in view of Chang as applied in claim 14 and further in view Shu. Applicants respectfully traverse the rejection. Claims 15 and 17-21 depend from claim 14. As set forth above, the combination of Saito and Chang fails to render claim 14 obvious. Additionally, Shu fails to cure the deficiencies of the combination of Saito and Chang. This failure precludes the combination of Saito and Chang and Shu from rendering claims 15 and 17-21 obvious. For these reasons, Applicants submit that claims 15 and 17-21 are in condition for allowance and respectfully request withdrawal of the § 103(a) rejection.

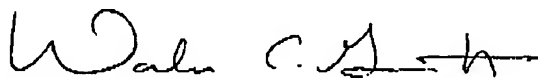
PATENT
Att. Dkt. No. A/VAN/001109***Allowable Subject Matter***

The Examiner indicated that claims 1, 2, and 4-7 are allowed. Applicants appreciate allowance of claims 1, 2, and 4-7. Additionally, new claims 27-30 depend from claim 1 and these claims are allowable for at least the same reasons as claim 1.

Conclusion

Having addressed all issues set out in the office action, Applicants respectfully submit that the case is in condition for allowance. If the Examiner has any questions, please contact the Applicants' undersigned representative at the number provided below.

Respectfully submitted,



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